

Application No. 10/695,435  
Amendment With RCE  
Reply to Office Action of January 18, 2006

### **REMARKS/ARGUMENTS**

In an Office Action dated January 18, 2006 claims 1 – 32 were rejected under § 102 based on Yamamoto. Applicants respectfully traverse the rejections and request consideration of the following arguments.

#### **Claim Amendments**

Independent claims 1, 10, 17 and 25 have been amended in several areas. First, they have been amended to require the storage processing device to perform virtualization and one of snapshotting, journaling or migration. Second, the claims have been amended to interactively perform rather than just interactively support. The third change is to change focus from a detailed architecture using port processors to placement of the storage processing device as part of a switched fabric. With the virtualization and other operation thus being performed as a fabric application with it specifically being claimed that the storage processing device operates whether the host or storage unit or units are directly connected or are coupled through a switch to emphasize the fabric-centric nature. It is also understood that storage units can be physical storage systems or LUNs (logical units) on physical storage systems.

#### **§ 102 Rejections**

##### **Claim 1**

Claim 1 was rejected over Yamamoto. Applicants submit that Yamamoto does not teach or suggest numerous elements of amended claim 1. First Yamamoto at most only relates to virtualization. Yamamoto has no teachings or suggestions relating to snapshots, journaling or migration, with one required in combination with virtualization in claim 1. Second, Yamamoto has no teaching or suggestion of use in a switched fabric with hosts and storage units connected to the switched fabric. Yamamoto is a dedicated unit designed to only be directly connected to the host and to SCSI disk drives.

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Applicants thus submit that numerous elements of claim 1 are not shown in Yamamoto when the claim and Yamamoto are fully considered. Therefore claim 1 and those dependent therefrom are allowable.

Claims 9 and 17

Applicants had noted that the prior Office Action had not identified any item correlating to the "at least one switch for coupling to the at least one host and the at least one storage device" required in both claims. The current Office Action references the bus structure 16 of Yamamoto as being the required switch. Applicants respectfully traverse this correlation. Even taking the overly broad definition of switch proffered in the Office Action, namely "a device or programming technique for making a selection," the bus structure 16 clearly cannot properly be equated to the switch required by the claims. A bus alone cannot be a switch. The Office Action acknowledges this as well by citing the connecting facility 40, not the buses 36A or 36B, as the switch coupling the port processors. Yet for the switch coupling the host, storage units and storage processing device, the Office Action just asserts a bus alone. Applicants submit this correlation is improper and must be withdrawn. Therefore claims 9 and 17 are allowable for these further reasons.

Claims 9, 17 and 25

The arguments above with respect to claim 1 apply to their corresponding claims in claims 9, 17 and 25, thus rendering those claims, and those dependent therefrom, allowable.

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**CONCLUSION**

Based on the above remarks Applicants respectfully submit that all of the present claims are allowable. Reconsideration is respectfully requested.

Respectfully submitted,

3/20/06  
Date

Keith Lutsch  
Keith Lutsch, Reg. No. 31,851

Wong, Cabello, Lutsch,  
Rutherford & Brucculeri, L.L.P.  
20333 State Highway 249, Suite 600  
Houston, TX 77070  
832/446-2405  
832/446-2424 (facsimile)

**CERTIFICATE OF FACSIMILE**

I hereby certify that this correspondence is being facsimile transmitted to the United States Patent and Trademark Office, to Commissioner for Patents, 571-273-8300, on the date below.

3/20/06  
Date

Keith Lutsch  
Keith Lutsch